

5

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 TODD PATTON,
D-2 JODI MCCOMAS,

Defendants.

Case: 2:22-cr-20008
Judge: Borman, Paul D.
MJ: Grey, Jonathan J.C.
Filed: 01-04-2022 At 03:19 PM
INDI USA V TODD PATTON ET AL 2 DFTS (SS)

VIO: 18 U.S.C. § 922(g)(1)
18 U.S.C. § 922(u)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Felon in Possession of a Firearm
18 USC § 922(g)(1)

D-1 TODD PATTON

On or about October 21, 2021, in the Eastern District of Michigan, the defendant, TODD PATTON, having previously been convicted of a felony, that is, a crime punishable by imprisonment for a term exceeding one year, and knowing that he had previously been convicted of a felony, did knowingly possess a firearm, that is, two Kimber Micro, 9mm semiautomatic pistols and a Kimber Raptor Micro, 9mm semiautomatic pistol, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

Theft of a Firearm from a Federally Licensed Firearms Dealer
18 USC § 922(u)

D-1 TODD PATTON

D-2 JODI MCCOMAS

On or about October 21, 2021, in the Eastern District of Michigan, the defendants, TODD PATTON and JODI MCCOMAS, did knowingly steal and unlawfully take and carry away from Dunham Sports, a premises licensed under the provisions of Chapter 44 of Title 18, United States Code, a firearm that was in Dunham Sports' business inventory, and said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(u) and 2.

FORFEITURE ALLEGATIONS

(18 U.S.C. §§ 924, 981(a)(1)(C); 21 U.S.C. § 853;
28 U.S.C. § 2461(c))

1. The allegations contained in Counts One and Two of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Sections 924 and 981(a)(1)(C).

2. As a result of the foregoing violations charged in Counts One through Six of this Indictment, the defendants TODD PATTON and JODI MCCOMAS shall, upon conviction, forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28 United States Code, Section 2461(c), any firearm, ammunition, or body armor involved in said offense(s).

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ Benjamin Coats
BENJAMIN COATS
Chief, Major Crimes Unit
Assistant United States Attorney

s/ Diane Princ
DIANE PRINC
Assistant United States Attorney

Dated: January 4, 2022

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete this form.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: DNP

Case Title: USA v. Todd Patton and Jodi McComas

County where offense occurred : Monroe

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

January 4, 2022

Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.